

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CORDIA FOSTER and CISLYN WRIGHT, 21-cv-11224 (CM)

Plaintiffs,

-against-

ELYSE DULA a/k/a ELYSE SNOW
and IAN K. SNOW,

Defendants.

-----X

Plaintiffs' Proposed Verdict Sheet

Respectfully submitted,

Law Offices of Scott A. Lucas
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Attorneys for Plaintiffs
Cordia Foster and Cislyn Wright

Plaintiffs, through their undersigned counsel, respectfully submit the following proposed verdict form:

Question 1:

Has either Plaintiff proved, by a preponderance of the evidence, that one or more Defendant harassed her or took any adverse employment actions against her, and that discrimination was a determinative factor in the Defendants' conduct?

At least five jurors must agree on the answer to this question.¹

Yes _____ No _____

Question 2:

Has either Plaintiff proved, by a preponderance of the evidence, that one or more Defendant harassed her or took any adverse employment actions against her, and that retaliation was a determinative factor in the Defendants' conduct?

At least five jurors must agree on the answer to this question.

Yes _____ No _____

(If you answered "no" to questions 1 *and* 2, you are finished with this verdict sheet and should not read any further. If you answered "yes" to questions 1 *or* 2, then proceed to question 3.)

Question 3:

What are the damages, if any, that Plaintiff Cordia Foster is entitled to recover?

Amount: \$ _____

(Please proceed to question 4.)

¹ If Defendants insist on a unanimous verdict, then this and the identical language herein should be removed.

Question 4:

What are the damages, if any, that Plaintiff Cislyn “Verona” Wright is entitled to recover?

Amount: \$ _____

(Please proceed to question 5.)

Question 5:

Should punitive damages be imposed against Defendants?

Yes _____ No _____

At least five jurors must agree on the answer to this question.

If you answered “No” to the preceding question, you are finished with this verdict sheet and should not read any further. If you answered “Yes” to the preceding question, please specify the total amount of punitive damages to be imposed against Defendants:

Amount: \$ _____

At least five jurors must agree on the answer to this question.

Respectfully submitted,

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By /S/ Scott A. Lucas